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Attorneys for the Plaintiffs

IN THE UNITED STATES DISTRICT COURT FOR THE  
DISTRICT OF NEW JERSEY  
(CAMDEN DIVISION)

JEFFREY BOWMAN, *et al.*,

Plaintiffs,

v.

WELLS FARGO BANK, N.A., *et al.*

Defendants.

CASE NO.: 1:10-cv-02912-NLH -JS

**PLAINTIFF'S NOTICE OF MOTION TO AMEND THE COMPLAINT**

TO: Charles A. Gruen, Esq.  
381 Broadway, Suite 300  
Westwood, NJ 07675  
Attorney for Wells Fargo

TO: Michael W. O'Hara  
Duane Morris, LLP  
100 American Metro Boulevard, Suite 150  
Hamilton, NJ 08619-2304

Plaintiffs, by and through their counsel, Joseph A. Mullaney, III, and the  
Law Office of Dimitrios Kolovos, LLC, hereby move the Honorable Court for an

Order permitting the amendment of Plaintiff's Civil Action Complaint pursuant to *Fed. R. Civ. Proc.* 15(a)(2). Plaintiff relies on her Brief in support thereof as well as other supporting documents. A proposed form of order is attached.

The Motion is based on Plaintiff's 1) additional counts are available to the Plaintiffs against the Defendants, and 2) to conform the alleged facts to the evidence obtained thus far.

Plaintiff requests the Court to decide the Motion on the papers unless opposed. The Court is requested to permit oral arguments should Defendants or any interested party contest this Motion.

s/Joseph A. Mullaney, III  
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Dated: May 31, 2011